

#4

In The United State District Court
For The Western District of Pennsylvania

Patricio Scott,
Plaintiff

Civil Action No:
20-cv-773

✓
Family dollar Store;
and Carnegie Borough
Police department
Defendants.

RECEIVED

MAY 28 2020

CLERK, U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

On October 1, 2019, plaintiff entered into the Family dollar Store located at 300 Broad Way Street, Carnegie, PA 15106. She waited patiently in line to be assisted. When her turn came up, she detect biases against a disabled customers. She made a request for the cashier to assist her on the lower add counters. Services counter top to accommodate her disability.

The cashier paged the store manager, Ben Betts to open the second ADA cash register to assist plaintiff. He verbally attack by wrongly accusing her of holding up peoples in a long line.

2

She made a request for him to assist her on the second ADA cash register. He made unreasonable demands to force her to reach a high debit card machine to slide her card like all the other customers. Plaintiff is confined to a wheelchair!

She was physically unable to reach the high machine to purchase her food items. The store manager, Ben Betts, refused to open the second ADA cash register nor did he allow the store cashier on duty to provide public accommodations on the ADA cash register to a disabled customer. Plaintiff wasn't allowed to buy her food.

She call 911! The store manager, Ben Betts, made a false statement to law enforcement. She contact the Family Dollar Store corporate office & used via U.S. certified mail requesting an automatic push button opener to be place on the front entrance of the store located at 300 Broadway Street, Carnegie, PA 15106.

3

On May 2, 2020, plaintiff return to the Store! She had to wait for a cashier to open the heavy door. The cashier closed the door before she was inside the building. This was a hate crime! She wasn't hurt nor was there any damage done to her wheelchair.

Plaintiff made a request for the cashier to assist her with reaching an item on the top shelves. The store manager, Ben Betts refused to assist her. She wasn't allowed to buy her items. She called 911! He made a false statement to enforcement. The Carnegieboro Police dept forced plaintiff to leave without purchasing her men's underwear.

The Family Dollar Store manager Ben Betts and the store cashier on duty violated plaintiff's rights under ADA Public accommodations. The Carnegieboro Police dept violated her ADA rights under equal opportunity of public private entities.

4

42 U.S. Code § 12182 prohibition of discrimination by public private entity. Plaintiff seek relief for ADA Customer Services cash register with a lower debit card machine counter top for wheelchair customers. She seek relief for an automatic push button door opener to be placed on the front entrance of the Family Dollar Store. Plaintiff seek relief for statutory and compensatory and whatever this deem to be appropriate in this civil case.

Respectfully Submitted

Patricia Scott

1842 Washington Street, 364

Heidelberg, PA 15106

412-349-5405